

EXHIBIT G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF CYNTHIA A. DELANCEY

I, Cynthia A. Delancey, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I worked as a billing processor for Empire Blue Cross/Blue Shield.

4. I arrived at work at 7:45 a.m. on the morning of 9/11. My office was located in the basement of the South Tower at Level B3. After the first passenger jet, American Airlines Flight 11, struck the North Tower, a security guard escorted myself and some coworkers out of the building through the garage to the ground level. The guard instructed us to stand in front of the building across the street from the South Tower.

5. As I stood near the South Tower, I watched in horror as the second passenger jet, United Airlines Flight 175, slammed into the upper section of the South Tower. The sky above me became black with smoke and building debris. Everyone around me began to scream and cry for help, and I watched as they rushed by me to escape the falling debris and the chaos that surrounded the area.

6. I began to run towards the buildings across from the South Tower area. Despite the falling building debris, I ran towards the revolving doors of a building entrance, but I fell and people started trampling over me. A stranger helped me to stand up.

7. The South Tower then began to collapse. In the panic that ensued, I sought refuge beneath a parked car. A tremendous wave of dust, toxins, and building debris fell around me, and the car and I became covered in rubble and dust. While I was fortunate to be alive in the chaos and destruction, I received numerous lacerations to my face and arms and I inhaled large quantities of dust and debris into my lungs and airways.

8. When I emerged from the rubble and debris several minutes later, I saw dead bodies, body parts, and building debris from the South Tower all around me. The scene was like something out of a horror movie.

9. Emergency personnel then approached me and they escorted me away from the area. After waiting for a period of time, I walk all of the way home to Queens while in a state of shock and confusion. My walk home took almost twelve hours to complete.

10. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: lacerations to her face and arms, headaches¹, lower back pain², asthma³, obstructive airway disease⁴, chronic cough⁵, and GERD⁶.


11. I further suffered, and continue to suffer from severe emotional distress as a result of these terrorist attacks. I have been diagnosed with post-traumatic stress disorder⁷ and depression⁸ as a result of my experience on 9/11. The horrific events that I witnessed on 9/11 directly caused all of the conditions, which continue to this day.

12. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

13. I previously pursued a claim (Claim Number VCF0016001) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 14 day of March 2022.


Declarant Cynthia A. Delancey

¹ See, Medical Records of Cynthia A. Delancey (DELANCEY_MEDS_000001), attached hereto as Exhibit B, at 0003.

² *Id.* at 0003.

³ *Id.* at 0004.

⁴ *Id.* at 0001.

⁵ *Id.* at 0004.

⁶ *Id.* at 0001, and 0004.

⁷ *Id.* at 0002, and 0003.

⁸ *Id.* at 0002, and 0003.

**EXHIBITS
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